

MORRISON FOERSTER

250 WEST 55TH STREET
NEW YORK
NEW YORK 10019-9601

TELEPHONE: 212.468.8000
FACSIMILE: 212.468.7900

WWW.MOFO.COM

MORRISON & FOERSTER LLP
AUSTIN, BEIJING, BERLIN, BOSTON,
BRUSSELS, DENVER, HONG KONG,
LONDON, LOS ANGELES, MIAMI,
NEW YORK, PALO ALTO, SAN DIEGO,
SAN FRANCISCO, SHANGHAI, SINGAPORE,
TOKYO, WASHINGTON, D.C.

April 24, 2024

Writer's Direct Contact
+1 (212) 336-4142
PSkinner@mofo.com

VIA ECF

Honorable Jessica G. L. Clarke
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *DRC LV Ventures, LLC v. Dalpour*, 23 Civ. 7827 (JGLC)

Dear Judge Clarke:

We represent Plaintiffs in the above-referenced matter. On April 15, 2024, we sent a joint letter to the Court pursuant to Rule 4(k) of the Court's Individual Rules and Practices in Civil Cases in connection with Plaintiffs' motion to compel the production of communications pursuant to the crime-fraud exception to the attorney-client privilege. On April 23, 2024, the Court entered an Order requiring Plaintiffs to file the "written requests at issue along with Defendant's responses." (Dkt. No. 40). We write in response to the Court's April 23, 2024 Order.

The document demands implicated in Plaintiffs' motion are Requests 9-15 and 28-36 of Plaintiffs' Second Set of Document Requests to Defendants, attached as Exhibit A, and Requests 1 and 2 of the subpoena Plaintiffs served on Morritt Hock & Hamroff ("MHH"), attached as Exhibit B. MHH has informed us that Defendants have asserted privilege over all communications between MHH and Defendants that are responsive to Requests 1 and 2 of the subpoena. Defendants' responses and objections to Plaintiffs' Second Set of Document Requests to Defendants are attached as Exhibits C and D. MHH's responses and objections to Plaintiffs' subpoena are attached as Exhibit E.

Respectfully,

S/ Peter M. Skinner
Peter M. Skinner

cc: John Thompson
(via ECF)